United States Department of the Interior

FISH AND WILDLIFE SERVICE
Chicago Metro Wetlands Office
1000 Hart Road - Suite 180
Barrington, Illinois 60010

(708) 381-2253

IN REPLY REFER TO

TAKE PRIDE IN AMERICA

January 25, 1993

EPA Region 5 Records Ctr.
248017

Mr. Robert Lance
U.S. Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. Lance:

The purpose of this letter is to comment on the Draft Feasibility Study Document for the Blackwell Landfill NPL Site in DuPage County, Illinois. Six comments are listed below.

1) Table 11 of this document lists Applicable or Relevant and Appropriate Requirements. Number 3 of the chemical-specific state requirements addresses Illinois Water Pollution Regulations. The "Requirement/Applicability" comment for number 3 incorrectly states that General Use Water Quality Standards do not apply to the surface waters of the site. Section 303.201, of Subpart B, of Subtitle C, of Title 35 states that "Except as otherwise specifically provided, all waters of the State must meet the general use standards of Subpart B of Part 302". Section 302.202 states that the purpose of general use standards is to protect, among other things, aquatic life and wildlife, whose use of the site cannot be eliminated. The surface waters of the site must meet all General Use Water Quality Standards (sections 302.201-302.12). This should also be stated in section 6.7.2.

2) Table 5 indicates that some contaminants have moderate to high bioaccumulation (biomagnification) potential, these contaminants would most likely affect higher predators, yet this is not discussed in section 3.4.

3) The presence of contaminants in background soil and sediment samples may be an indication of disposal activity or spills away from the main landfill, or prior to construction of the landfill.

4) The sediment samples contained many tentatively identified compounds, yet no mention was made in section 3.4 as to the effect that these may have (either alone or synergistically) on aquatic organisms.

5) Remedial Action Alternatives 6 and 7 are preferred by our agency because they include leachate treatment and cap repair, minimizing the potential for continued contaminant release. However, the contaminated soil and sediment issue still needs to be addressed.

6) Sections 3.1.5 and 3.1.6 attempt to attribute the inorganic constituents detected in Spring Brook to upstream wastewater effluent, yet the downstream sediment sample (SD-8), contains higher concentrations than the upstream sample (SD-7), for 13 out 15 inorganic parameters. This would indicate contamination entering this brook from the site.

This letter was prepared under authority of, and in accordance with Section 2, of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended: 16 U.S.C. 661 et seq.), and the National Environmental Policy Act of 1969. If you have any questions please contact Mr. Edward Karecki at 708/381-2253.

Sincerely,

Benjamin N. Tuggle, Ph.D.
Field Supervisor

cc: Sheila M. Huff